

**SERCARZ & RIOPELLE, LLP**

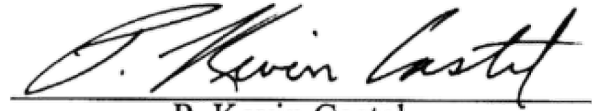
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ROLAND G. RIOPELLE  
MAURICE H. SERCARZ\*

\*ADMITTED IN NY & NJ

Application Granted.  
SO ORDERED.

Dated: 6/27/2024



P. Kevin Castel  
United States District Judge

June 19, 2024

**BY PRIORITY MAIL and ECF**

The Honorable P. Kevin Castel  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Da Costa, 23 CR 610 (PKC)**  
**Wilson Daniel Freitas Da Costa - Defendant**

Your Honor:

Enclosed please find an unredacted courtesy copy of Defendant Wilson Da Costa's Motion for Bail with a thumb drive containing accompanying Exhibits A through I.

I write to request that Exhibits A and B of our motion may be filed under seal.

These exhibits were obtained from the Government as part of Discovery. The exhibits were provided to defense counsel pursuant to a Protective Order which restricts the individuals who are permitted to view the contents of the documents. As a result, the public filing of our motion will result in the dissemination of Discovery material beyond the bounds of the Protective Order.

**Conclusion**

[ For all of the reasons set forth herein, we respectfully request that the Court permit us to file Exhibits A and B under seal. ]

Most respectfully,

/s/ Maurice H. Sercarz

cc: All Parties (by ECF)